

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHOSHANA ROBERTS,)
Plaintiff,) Case No. 15-cv-_____
)
-against-)
ROB BLISS, ROB BLISS CREATIVE,) **NOTICE OF REMOVAL**
LLC, HOLLABACK! INC., TGI) **PURSUANT TO**
FRIDAYS INC., MADE MOVEMENT) **28 U.S.C. § 1446 (a)-(b)**
LLC,
)
Defendants.)
)

TO THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK:

1. Made Movement LLC (“Made”) and TGI Friday’s Inc. (“Friday’s”) are defendants in the civil action titled *Roberts v. Bliss et al.*, No. 157085/2015, brought by Shoshana Roberts (“Plaintiff”) in the Supreme Court of the State of New York, New York County. Pursuant to 28 U.S.C. §§ 1441 and 1446, Made and Friday’s hereby remove this action to the United States District Court for the Southern District of New York, the judicial district in which this action is pending.

2. Made and Friday’s file this Notice of Removal with consent from all defendants who have been properly joined and served, as confirmed by the signatures below.

3. Made and Friday's remove on the ground that Plaintiff's Complaint alleges a cause of action against all defendants which arises under the United States Trademark Act of 1946 (Lanham Act § 43(a), 15 U.S.C. § 1125(a)).

4. Accordingly, removal is proper under 28 U.S.C. § 1441(a) because this Court would have had original subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question jurisdiction), 28 U.S.C. § 1338, and 28 U.S.C. § 1367(a) (supplemental jurisdiction) if the action had originally been brought in federal court.

5. This notice is timely under 28 U.S.C. § 1446(b) as it was filed within thirty days after December 1, 2015, the date that Made and Friday's received a copy of the Complaint containing the cause of action arising under U.S. law.

6. Finally, copies of all process, pleadings, and orders served on the defendants to date, including the Summons with Notice, Plaintiff's Complaint and the parties' stipulation to extend the time to answer or respond, are attached hereto as Exhibit A.

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Dated: December 31, 2015
New York, New York

FRANKFURT KURNIT KLEIN & SELZ, PC

By: /s/ Craig B. Whitney
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*Attorneys for Defendants
Made Movement LLC and
TGI Friday's Inc.*

JOINED AND CONSENTED TO BY:

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*Attorneys for Defendant Rob Bliss and
Rob Bliss Creative, LLC*

WILSON ELSEY

By: _____
Steven L. Young, Esq.
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*Attorneys for Defendant
Hollaback! Inc.*

Dated: December 31, 2015
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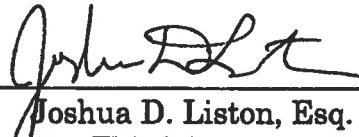
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